

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division**

| | | |
|--------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA |) | Criminal Case 4:23CR45 |
| Plaintiff |) | |
| |) | Hearing: September 21, 2023 |
| v. |) | |
| |) | Chief Judge Mark S. Davis |
| DEJA NICOLE TAYLOR |) | |
| Defendant |) | Magistrate Judge Douglas E. Miller |

RESPONSE IN OPPOSITION TO MOTION TO REVOKE BOND

Defendant Deja Nicole Taylor, by and through her counsel, hereby files with this Honorable Court a response in opposition to the United States' September 1, 2023, motion to revoke bond. Ms. Taylor does not dispute the factual assertions in the government's motion. However, since the filing of the motion, there have been substantial positive developments that counter the government's strong objections to Ms. Taylor's remaining on bond.

Most important, Ms. Taylor freely admits that she has had and still faces a serious substance abuse challenge. Her addiction is clearly a disease – nonetheless, revocation and incarceration are not the cures. We respectfully submit that a jail cell will only exacerbate the deep issues that she is facing. We oppose the motion for the following reasons:

1. Since August 25, 2023, Ms. Taylor has been working with and communicating regularly with the Probation Officer and her supervisor. On or about September 11, both officers gave indications to Ms. Taylor that they are *very pleased with and proud of* her progress.

2. Since August 25, Ms. Taylor has timely provided drug tests (four) to the Probation Office. Although the tests has indeed been positive for marijuana, the levels are decreasing and show that Ms. Taylor is abstaining from this drug. The four recent tests corroborate Ms. Taylor's assertion that the positive test for cocaine, which has only showed up this one time in her history, was an aberration and likely caused from her use of marijuana unknowingly laced with cocaine.
3. Since August 25, Ms. Taylor has had regular and full compliance with the persons who run the counseling program with Mental Health Services.

Wherefore, we respectfully ask this Court to give Ms. Taylor a
Second chance and deny the motion to revoke bond.

Respectfully submitted,

_____/s/
Gene Rossi, Esquire
VSB Number 93136
Carlton Fields, PA
Suite 400 West
1025 Thomas Jefferson Street, NW
Washington, DC 20007-5208
Telephone: 202-965-8119
Cell: 703-627-2856
Email: grossi@carltonfields.com

James S. Ellenson
Va State Bar 20621
101 25th Street
Suite 756
Newport News, VA 23607
Telephone: 757-343-0979
Cell 757-556-1366
Email: jseatty@aol.com

CERTIFICATE OF SERVICE

I hereby certify that the **RESPONSE IN OPPOSITION TO MOTION TO
REVOKE BOND** was filed with the Clerk of the Court via ECF on Wednesday,
September 13, 2023.

Respectfully submitted,

_____/s/
Gene Rossi, Esquire